

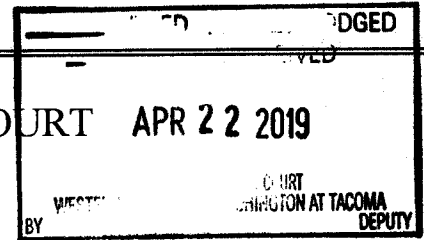
Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

APR 22 2019

for the
District of

Division



June Elizabeth Brogdon

Case No. **CV19 5332 BHS**
(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-
- State of Washington
Children's administration
- Vancouver Police Dept

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☒ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

June Elizabeth Brogdon
86-086 Farrington Hwy #111
Waianae, Honolulu County
Hawaii 96797
360-901-1490
symRich36@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Vancouver Police dept

N/A

520 SE 155th Ave

Vancouver, Clark County

WA 98683

360-487-7500

N/A

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Children's Administration

N/A

907 Harney ST

Vancouver, Clark County

WA 98660

360-993-7900

N/A

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

- ☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

- Weeks V. United States 1914
- Woolley V. City of Baton 5th Cir. 2000 Rouge
- Wallis V. Spencer 9th Cir 1999/2000
- Chrissy V. Miss Department of Public Welfare 5th Cir 1991

→ see attachment

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

A. **Statues:** (J.b. v. Washington county 10th cir 1997.) (Doe et al 7th circ app 2003) (Brokaw v. Mercer county 7th cir 2000) (Parham v. Jr 1979) (K.h. through murphy v. Morgan 7th cir 1990) (Quilloin v. Walcott 1978) (42 u.s.c 1983) (Hurlman v. Rice 2nd cir 1991) (Good v. Dauphin county social services 3rd cir 1989) (California v. Hodari 499 u.s. 621 1991.) (Bell v. city of Milwaukee 7th cir 1984) (Carson v. elrod) (Doe v. Irwin U.S. D.C. of Michigan 1985) (Elrod v. Burns 96 5th CT 1976) (Franz v. U.S.) (In re J.S and C.) (Kelso v. Springfield US Ct. app 9th 1985) (Langton v. Maloney/527ssup 538 D.C. conn 1981) (Matter of Delancy/617 2nd 886 Oklahoma 1980) (Mary v. Anderson/73 s. ct. 840 840 1952) (Santosky v. Kramer) (Brokaw v. mercer county/ 7th cir 2000) (Chrissy v. miss department of public welfare) (K.H. through Murphy v. Morgan/7th cir 1990) (Ram v. Rubin/9th cir 1997) (J.B. V. Washington county/10th cir1997) (Wallis v. spencer/9th cir 1999/2000) (Whisman v. Rinehart/8th cir 1997) (Lenz V. Windburn 11th 1995)

The trial to deprive the Fathers of their rights (Statues):

(Parham v. T.r. 1979) (Lassiter v. Department of social services) (Troxel v. Grandville 2002)

(Nicholson v. Williams) (Morris v. Dearborne/5th cir 1999)

3/28/2019

Jane Brown

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

N/A

III. Statement of Claim

→ Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See attachments

IV. Relief

— See attachment

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Statement of claim: Vancouver Police officer

May 5, 2012 at 9:00 Pm I was talking to my ten year old daughter about the damage she caused to our home resulting in a bill from the landlord over \$4,000 dollars. She was in therapy through the Children's Administration office because I contacted their office for help in 2011 asking for mental help for my daughter because she showed signs of having a behavior disorder. I told my daughter that we couldn't afford to pay for the damage and that's when she started crying and threatening to kill herself. I called the Children's Administration Hotline to ask for advice on what to do about her threats of suicide and they told me to go to the nearest emergency room and request a suicide assessment. I took my children to SW Medical Center and requested an assessment. During the assessment my daughter told the nurse that I had a knife in my purse and I was threatening to kill her but, the Hospital called the police without telling me why they were there. I didn't know why the nurse called the police until I requested a copy of the police report. Officer Henderson walks up to me in the emergency room without telling me why he was there. I told him that my daughter was in therapy for false allegations, stealing, lying and causing damage to our home. He asked me if he could take my children to a family member home for the night and I told him 'No.' the officer told me that he was taking my children and giving them to child protective services. He didn't read me my rights. I left the Hospital without knowing why the officer was there. My son was six years old and the officer didn't speak to him at all. After receiving the police report I discovered that my daughter told the nurse that I had a knife in my purse in the waiting room and the police said in the report that I didn't have a purse or a knife. My daughter told the nurse one story then changed her story while talking to the police. The investigator for children's administration put in his report that my daughter said she forgot what she told the nurse. Children's administration paid for her therapy because she made false allegations of sexual abuse to a Hospital and the doctors told me to put her in therapy because she was lying. The officer didn't tell me why he was at the Hospital or why he was looking for a knife on me. My daughter told the officer a different story then what she told the nurse so that's another reason to believe that she wasn't telling the truth. My son and I were in the waiting room unaware of what was going on so the officer shouldn't have taken my children without a complete investigation and asking my son and I about the allegations made by my daughter. The officer didn't believe my children were in danger or he wouldn't have asked me if he could drop my children off with a family member for the night. If the office believed that I threatened my child with a weapon that would be a felony harassment charge in Washington State because threats are not freedom of speech. My children were taken from SW Medical Center and I had no idea where they were going or why they were taken. I didn't get to say good bye.

June Brogan

Statement of claim: *Children's Admin*

May 7, 2012 I went to the Children's Administration office and met with the investigator Jeffrey Asporcolas and he refuse to tell me why they had my children in custody. I gave him the birth certificates along with the information for both fathers because I was investigate by Child protective services in Portland when my daughter lied to the Hospital saying that she was raped but, doctors confirmed that she was a virgin and lying. He wouldn't tell me any court dates and he told me that I couldn't see my children. My family and I kept calling the office trying to reach the social worker Kevin storm but, he never returned my calls and he wouldn't tell my family why my children were in custody. My mother was allowed to see them one time but, that's it. I requested a copy of the police report and that's when I found out about the allegation made by my daughter but, CPS wouldn't speak to me about the night my children were taken. I obtained a copy of my file from Kevin Storm and that's when I saw hundreds of pages of fabricated information. My contact information was wrong with fake phone numbers that's one reason my attorney's couldn't find me. May 7, 2012 Children's Administration told the court that my children were taken because I had mental problems and I went to the Hospital to give them away while having panic attacks. They told lies saying that my daughter told the nurse, police and CPS investigator the same story of being threatened with a knife. The court was told that my children's fathers were JOHN DOE and I didn't have a father on the birth certificates or child support orders. They fabricated stories to the court saying that I took my children to a field to murder them and dump their bodies. They told the court that I was driving around Vancouver at 4am looking for a river to dump my children in so I could kill them. The State interviewed both of my children and they both said that I never hit them, abuse them or neglect them. The State intentionally fabricated a whole case and every piece of information given to the court was fabricated. I wasn't allowed to see my children, my family couldn't take my children into their home, I completed parenting classes on my own and CPS told the court that I cussed them out refusing to take the classes, I couldn't afford an attorney and they wouldn't tell me where to find my attorney, they fabricated mental problems and told the court that I'm delusional. They was fishing for information when they found a police report of a man that went to prison for felony harassing me and used that report to claim that I was delusional and used his girlfriend to testify against me. Children's Administration knew they didn't have a reason to take my children, keep my children or put my kids up for adoption. My kids were illegally seized therefore, they couldn't pursue the case but, they did it by violating my civil rights, deceiving judges and not inviting me to court dates to defend myself or allowing the fathers to be a part of the case. They told the court my deceased grandmother, Elessie Brogdon, told them to put my children up for adoption but, she passed away in 1999. They fabricated my whole case after my children were illegally taken from me.

Relief:

-I want the court to order the children's Administration to clear my record of child abuse (maltreatment). The stuff they put on my record stopped me from graduating from College with my degree in Education after I completed the first two years of my degree. The record they gave me stopped me from working as a Daycare owner after I passed the federal background check and have taken a few classes to keep children for the State.

-I want the court to order Children Administration to reverse the adoptions of my children as soon as possible.

-I want my parental rights back and both fathers to have their rights back.

-I want my children to come back home as soon as possible.

-I want punitive damages for the pain and suffering, emotional distress, losing my job, dropping out of college and preventing me from becoming a School teacher leaving me with student loans and medical bills because this case caused me to become chronic sleep deprived and I started having seizures. I'm on medication for seizures for the rest of my life.

June Brogdon 3/28/2019

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3/28/2019

Signature of Plaintiff

Printed Name of Plaintiff

June Brogan
June Brogan

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

The night my kids were taken 5/5/2012

Vancouver Police Department										Case No. 12-7230		
Individual												
Role 1	Seq 1	Type 1	Last Name [REDACTED]			First Name [REDACTED]			Middle Name [REDACTED]		Sex [REDACTED]	Race [REDACTED]
Birth Date [REDACTED]		Ethnicity [REDACTED]			Role Description Involved or Mentioned							
Age Low [REDACTED]	Age High [REDACTED]	Hgt [REDACTED]	Wgt [REDACTED]	Hair [REDACTED]	Eyes [REDACTED]	Residence [REDACTED]	Employment/Occupation [REDACTED]					
Driver's License Number [REDACTED]			Driver's License Issuer [REDACTED]		Social Security No. [REDACTED]		State ID No. [REDACTED]		FBI No. [REDACTED]		PCN [REDACTED]	
Custody Status [REDACTED]		Gang Affiliation [REDACTED]			Tribe Affiliation [REDACTED]			Identifiers Affiliation [REDACTED]				
Comments [REDACTED]												
Type [REDACTED]		Location [REDACTED]				City [REDACTED]		State [REDACTED]		Zip Code [REDACTED]		
Individual												
Role 1	Seq 2	Type 1	Last Name [REDACTED]			First Name [REDACTED]			Middle Name [REDACTED]		Sex [REDACTED]	Race [REDACTED]
Birth Date [REDACTED]		Ethnicity [REDACTED]			Role Description Involved or Mentioned							
Age Low [REDACTED]	Age High [REDACTED]	Hgt [REDACTED]	Wgt [REDACTED]	Hair [REDACTED]	Eyes [REDACTED]	Residence [REDACTED]	Employment/Occupation [REDACTED]					
Driver's License Number [REDACTED]			Driver's License Issuer [REDACTED]		Social Security No. [REDACTED]		State ID No. [REDACTED]		FBI No. [REDACTED]		PCN [REDACTED]	
Custody Status [REDACTED]		Gang Affiliation [REDACTED]			Tribe Affiliation [REDACTED]			Identifiers Affiliation [REDACTED]				
Comments [REDACTED]												
Type [REDACTED]		Location [REDACTED]				City [REDACTED]		State [REDACTED]		Zip Code [REDACTED]		

Narrative

ATTACHED ITEMS:

None

SUMMARY:

[REDACTED] told Southwest Washington Medical Center staff that [REDACTED] June Brogdon, threatened to kill [REDACTED]. Both [REDACTED] were placed with Child Protective Services. Forward to CJC and CPS.

NARRATIVE:

On Friday May 4th 2012 at about 0223 hours, Sergeant Henderson and I were dispatched to the Southwest Washington Medical Center due to a 911 call of Threats.

[REDACTED] reported to emergency room nurse, Karen Butler, that [REDACTED] threatened to kill [REDACTED] because she thinks they stole money from her. [REDACTED] went on further to say [REDACTED] had a knife in her purse.

Upon arrival to the SWWMC emergency room I made contact with Karen Butler at the emergency room entry doors.

Report Written By: Bibens, Therman	PSN 1400	Ref Case Number	Report ID ORIGINAL	12007230	Agency/Case No. VPD
Approved By: Henderson, David	PSN 1220				
Report Printed By:	PSN 1592				
Crane, Stephanie E on 1/5/2017 10:12:41AM					

the night my kids were taken.
✓

Vancouver Police Department

Case No.
12-7230

Narrative

Karen told me she has only gathered a statement from [REDACTED] since the family has been in the hospital. I asked Karen where [REDACTED] June Brogdon currently was. At this same time June walked to my location from the parking lot with [REDACTED].

June did not have her purse in her possession. — *no knife or purse*

I asked June if I could speak with her. We went into the area of the family waiting room at the SWWMC. [REDACTED] went to another room with a different nurse to retrieve some toys.

I asked June what was the reason she brought [REDACTED] to the hospital. She told me [REDACTED] has behavioral problems but she will "never ask for help again" for [REDACTED]. I asked why she would not ask for help again and she told me that [REDACTED] is probably "playing the victim, drama queen" and that is why the police are here. June told me this happened about a year ago when [REDACTED] said she hit [REDACTED] in then face with her cell phone and CPS got involved. She added [REDACTED] "always lies and gets what [REDACTED] wants."

On this same night at about 2200 hours, June told me she called CPS for help with [REDACTED] behavior and the was instructed to bring [REDACTED] to the hospital for a behavioral evaluation.

I asked June what happened to warrant her calling CPS tonight. June told me [REDACTED] routinely steals items in the home and hides them or gives it away. June said her earrings have been missing and she found them tonight in [REDACTED] backpack along with her make-up and lip gloss. June told me tonight [REDACTED] also stole \$200 in money orders that was going to be used to pay bills. Now she has no money to pay the bills.

June went on further to tell me that [REDACTED] has had behavioral problems in the past and [REDACTED] has destroyed the home, broken electronics, burnt [REDACTED] with the iron, steals her cell phone and money from her purse. June said she has called CPS for help a number of time in the last 2 years but nothing ever helps. She said [REDACTED] has taken part in therapy with no positive outcome.

The last time June told me that [REDACTED] behavior got this bad she dropped [REDACTED] off at the CPS office in downtown Vancouver. June said [REDACTED] was placed into a foster care home for 2 days before [REDACTED] was returned home. She said this was about 2 years ago.

I asked June if she ever threatened [REDACTED]. She told me "yeah, I threatened to whoop [REDACTED] but [REDACTED] is menstruating." I asked what she meant. June said she will not "spank" [REDACTED] while [REDACTED] is on her period. I told June that [REDACTED] said she had threatened to kill [REDACTED]. June denied that allegation and later said "I knew they were coercing [REDACTED] into saying something." June said "they (nurses) had [REDACTED] back there for about an hour." She added that she knew they were talking about "something like that."

I met with Sergeant Henderson and gave him a summary of what June said. Sergeant Henderson collected a statement from RN/Karen Butler. See the supplemental report.

We determined that [REDACTED], would be placed with Child Protective Services until the home could be deemed a safe environment.

This decision was explained to June who was visibly upset and stated that she came here for help and "this is what happens." I asked if there was any family in the Vancouver area so I could report the possible family placements to CPS. June then said "no" and "just take em" and left the hospital.

[REDACTED] was brought back to be with [REDACTED], in room number 63 where they ate and awaited CPS staff arrival for placement.

Report Written By: Bibens, Therman	PSN 1400	Ref Case Number	Report ID ORIGINAL	12007230	Agency/Case No. VPD
Approved By: Henderson, David	PSN 1220				
Report Printed By: Crane, Stephanie E on 1/5/2017 10:12:41AM	PSN 1592				

Reason for hospital visit.

SOUTHWEST WASHINGTON MEDICAL CENTER
VANCOUVER, WASHINGTON**SUICIDE / SELF-HARM
ASSESSMENT TOOL**

For suicidal patients, RN must complete on admission, RN/LPN each shift, at discharge and any time when suicidal or self-harm risk is being assessed. For definitions see attachment B of the Suicide / Self-Harm Policy # 8720.071.

Directions:

1. Complete Section I (circle corresponding number).
2. Complete Section II (circle corresponding number that BEST describes the patient). For patients at moderate or high risk, include plan details when known or identified.
3. Complete Section III (circle the answer and corresponding number).
4. Add the points to obtain a total score. Use Scoring Key in section IV, document score on Suicide / Self-Harm Precautions Flowsheet.

I. Is the current admission precipitated by a suicide attempt? YES - 2 NO - 1

II. Key Factors	High Risk	Moderate Risk	Low Risk
Patient's / Staff perception about ability of patient to be safe	Unwilling (unreliable) to discuss personal safety OR Unable to discuss because of impaired reality testing (hallucinations, delusions, dementia, delirium, dissociation) 2	Discusses safety but is ambivalent, guarded and/or somewhat inconsistent. 1	Reliably discusses personal safety 0
Suicide Plan	Has a plan with actual or potential access to planned method 2	Has a plan without access to a planned method 1	No plan 0
Plan Lethality	Highly lethal plan (gun, hanging, jumping, carbon monoxide) 2	Moderate lethality of plan (deep cutting, OD) 1	Low lethality of plan (superficial scratching, head banging, pillow over face, biting, holding breath) 0
Elopement risk	High elopement risk 2	Low elopement risk 1	No elopement risk 0
Suicidal Ideation	Constant suicidal thoughts 2	Intermittent or fleeting suicidal thoughts 1	No current suicidal thoughts 0
Attempt History	Past attempts of high lethality 2	Past attempts of low lethality 1	No previous attempts 0
Symptoms (circle those that apply) hopelessness, helplessness, anhedonia, guilt, shame, anger, rage, impulsivity	5-6 symptoms present 2	3-4 symptoms present 1	0-2 symptoms present 0
Current morbid thoughts (reunion fantasies, preoccupation with death)	Constantly 2	Frequently 1	Rarely 0
III. RN's subjective appraisal of patient's reliability: 2 = Pt. replies not trustworthy, several nonverbal cues 1 = Pt. replies questionably trustworthy, at least one nonverbal cue 0 = Pt. replies trustworthy			
IV. Scoring Key	HIGH RISK 10 + points	MODERATE RISK 4-9 points	LOW RISK 0-3 points
Adapted with permission from Gail Stuart RN, PhD - Principles and Practices of Psychiatric Nursing, 6th Ed., Mosby 1998			
Total Score _____ Date/Time _____ Staff Signature _____			

2006 2007

1212500068 066-75-06
DOB: 05/04/12 EDQ ED 10Y/F
Adm: 05/04/12
PCP: 1019 VANCOUVER, CLIN

4ASM



Printed 5/4/2012 at 00:35

Page 1 of 1

WASHINGTON, DAYJAH (7 - 12 yr + F) Psychiatric Screening Exam

June E. Brogdon

~~1000 S.W. 100th Ave Unit B~~

~~Weston, MA 02456~~

Page Number: 1 of 1

Print Date : 06/25/2018

Student ID : 0419705

SSN : ###-##-

Birth Date :

Issued To:

June Brogdon

~~1000 S.W. 100th Ave Unit B~~

~~Weston, MA 02456~~

Attempt-Cr Earned-Cr Grd R Grade-Points

Other Credits:

Clark College

28.00

Portland Community College

57.00



Oregon

John A. Kitzhaber MD, Governor

July 28, 2011

June Elizabeth Brogdon

Employment Department
Child Care Division Central Office

875 Union St NE

Salem, OR 97311

(503) 947-1400

(800) 556-6616

Fax (503) 947-1428

www.WorkingInOregon.org



Dear June:

RE: Enrollment in the Central Background Registry
Registry Number R297654

This is to inform you that you have been enrolled in the Child Care Division's Central Background Registry. Your registration is valid for a two year period:

July 19, 2011 - July 19, 2013

Please retain this letter for your own records. This notification will not be sufficient evidence of current enrollment in the Central Background Registry. It is the facility's responsibility to link you to their employment records by contacting the Child Care Division. The facility will receive a confirmation letter of your enrollment in the Central Background Registry for their files.

We will mail a renewal notice to the address above four months prior to the expiration date. If you move, change your name or address, please provide us with your new information. It is your responsibility to re-enroll prior to expiration if you wish to continue to be employed in one of the programs above or be in a family child care home.

- Child Care Provider

I completed classes
to get my kids back

Children's Home Society of Washington

CERTIFICATE OF PARTICIPATION

This certifies that

Time Brogdon

Southwest Region
Vancouver Family
Resource Center
303 W 12th Street
Vancouver, Washington
98660
360/695-1325

Attended and completed the 12 week
Families Creating Change Class offered
through Children's Home Society of
Washington.

Signature: *W. [unclear]* Date: *2/14/14*
Parent Educator

CHILDREN'S
HOME SOCIETY
Washington



COPY
ORIGINAL FILED
MAY 07 2012
Juvenile Department
Scott G. Weber, Clark Co.

SUPERIOR COURT OF WASHINGTON COUNTY OF CLARK JUVENILE COURT	
Dependency of: W _____ T _____ D _____ DOB: _____	No: 12-7-00495-3 Dependency Petition (DPP)

I. Basis

I represent to the court the following:

1.1 Child alleged to be dependent:

☒ male ☐ female

Name	
Date of Birth	
Home Address	810 SE 153rd Ave, Apt # B, Vancouver, WA 98683

1.2 Parent(s) or Legal Guardian(s):

<input checked="" type="checkbox"/> Mother	<input checked="" type="checkbox"/> Father <input type="checkbox"/> presumed <input checked="" type="checkbox"/> alleged
Name Jane Elizabeth Brogdon	Name John Doe
Date of Birth	Date of Birth Unknown
Marital status <input checked="" type="checkbox"/> single <input type="checkbox"/> married <input type="checkbox"/> other	Marital status <input type="checkbox"/> single <input type="checkbox"/> married <input type="checkbox"/> other
Driver's License or Identicard (# and State)	Driver's License or Identicard (# and State)
Home Address 810 SE 153rd Ave, Apt # B	Home Address

*CPS told
Court
kids did
not have
fathers.*

CERTIFICATION OF VITAL RECORD

10

CERTIFICATE OF LIVE BIRTH

CERTIFICATE NUMBER: 136-02-10822

1. NAME: D. D. W.
2. SEX: FEMALE
3. BIRTH DATE: 2002
4. BIRTH PLACE: MULTNOMAH COUNTY
5. MOTHER'S MAIDEN NAME: JUNE ELIZABETH BROGDON
6. MOTHER'S BIRTH PLACE: OREGON
7. FATHER'S NAME: GARY D WASHINGTON
8. FATHER'S BIRTH PLACE: NOT STATED

RECORD FILE DATE: APRIL 8, 2002

ITEM 1 AMENDED BY AFF#Z21814 ON 06-03-02



I CERTIFY THAT THIS IS A TRUE, FULL AND CORRECT COPY OF THE ORIGINAL CERTIFICATE ON FILE OR THE VITAL RECORD FACTS ON FILE IN THE VITAL RECORDS UNIT OF THE OREGON CENTER FOR HEALTH STATISTICS.

DATE ISSUED: JULY 31, 2008

JENNIFER A. WOODWARD, Ph.D.
STATE REGISTRAR

THIS COPY IS NOT VALID WITHOUT INTAGLIC STATE SEAL AND BORDER.

CERTIFICATE OF LIVE BIRTH

CERTIFICATE NUMBER: 136-06-12675

1. NAME: T I J W
2. SEX: MALE
3. BIRTH DATE: 2006
4. BIRTH PLACE: MULTNOMAH COUNTY
5. MOTHER'S MAIDEN NAME: JUNE ELIZABETH BROGDON
6. MOTHER'S BIRTH PLACE: OREGON
7. FATHER'S NAME: WALLACE CAMPBELL
8. FATHER'S BIRTH PLACE: NOT STATED

RECORD FILE DATE: APRIL 17, 2006

I CERTIFY THAT THIS IS A TRUE, FULL AND CORRECT COPY OF THE ORIGINAL CERTIFICATE ON FILE OR THE VITAL RECORD FACTS ON FILE IN THE VITAL RECORDS UNIT OF THE OREGON CENTER FOR HEALTH STATISTICS.

DATE ISSUED: JULY 31, 2008

JENNIFER A. WOODWARD, Ph.D.
STATE REGISTRAR

THIS COPY IS NOT VALID WITHOUT INTAGLIO STATE SEAL AND BORDER.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

STATE OF OREGON, DEPARTMENT OF JUSTICE
By the Administrator, Division of Child Support

County : MULTNOMAH

Court # :

CSP # : 051-EF1 385C-41

PARTIES TO THIS ACTION: State of Oregon, GARY D WASHINGTON, AKA GARRET WASHINGTON
and JUNE BROGDON

0404-63613

[] AMENDED

NOTICE AND FINDING OF FINANCIAL RESPONSIBILITY AND PROPOSED FINAL/ORDER

Child(ren)	Date(s) of Birth	Probable Date(s) of Conception
DJ W	02	07/01

FILED
04 APR - 8 PM 3:43
JUDICIAL DISTRICT
ENTERED
APR 12 2004
IN REGISTER BY DB

[] This action is being amended because _____

Pursuant to ORS 416.400 to 416.470 and/or ORS 110.318, the Administrator FINDS and NOTIFIES you that Oregon has personal jurisdiction over the parties, and FINDS that paternity has not been legally established and NOTIFIES you that this notice and finding will be entered as an order pursuant to ORS 416.415, unless a party denies paternity, requests a hearing, or objects in writing within 30 days of receipt of this paper. Refer to the procedures listed on this notice.

PATERNITY

[xx] GARY D WASHINGTON is the father of the above child(ren) who is/are in the custody of JUNE BROGDON. The mother of the child(ren) is JUNE BROGDON.

ON-GOING/CURRENT CHILD SUPPORT

[xx] Based upon the current financial circumstances of the parties and the application of OAR 137-050-0320 through 137-050-0490, as set out in the attached worksheet(s), GARY D WASHINGTON shall pay the sum of \$ 113 per month beginning the date the final order is signed for the support of the minor child(ren). GARY D WASHINGTON shall pay by check or money order to the Department of Justice, Central Services Region, PO Box 14506, Salem OR 97309, unless the payments are being withheld by GARY D WASHINGTON's employer.

[x] The guideline amount of \$ 113, as shown on the attached guideline computation worksheet, is just and appropriate.

[] The presumed amount of child support under the guidelines is \$ _____. This amount is unjust or inappropriate under OAR 137-050-0330(2)(a) because:

TERM/LENGTH OF PAYMENTS

[xx] Support payments are due each month until all children are age 18, or age 21 if attending school as defined in ORS 107.108, or become married, emancipated or enter military

- Both fathers are on the birth certs

STATE OF OREGON, Child Support Program (CSP), by the Administrator (ORS 25.010)
County: Multnomah Court #: 0711-72231 CSP #: 051AAL41341
Other Jurisdiction: Washington Case #: 0001920590
Children: T W
Obligor: Wallace Campbell
Obligee: June E Brogdon

**MONEY AWARD
INCLUDING CHILD SUPPORT AWARD
WITH CONTINGENT MEDICAL SUPPORT**

JUDGMENT CREDITOR/OBLIGEE:

Name: June E Brogdon
Address: PO BOX 11520
TACOMA, WA 98411

JUDGMENT CREDITOR/STATE OF OREGON:

Division of Child Support (DCS) o/b/o Washington
PO Box 14506, Salem OR 97309
In Salem: (503) 378-5567
Toll Free: 1-800-850-0228
Attorney for State of Oregon
Attorney's address: Jonathan Tucker
621 SW MORRISON STE 1100
PORTLAND, OR 97205
Attorney's telephone no.: (971) 673-1677

JUDGMENT DEBTOR/ OBLIGOR:

Name: Wallace Campbell
Address: 8540 N SWIFT WAY #71
PORTLAND, OR 97203
Year of birth:
Social Security Number (last 4):
Driver's license no. (last 4)/state:

CHILD SUPPORT AWARD BEGINNING 03/01/2012

\$100.00 cash child support per month.

\$0.00 cash medical support per month. Cash medical support will accrue whenever private health care coverage is not being provided by judgment debtor/obligor. Cash medical support is accruing at this time because private health care coverage is not being provided.